



## COMMUNICATIONS GENERAL CORPORATION

DOCKET FILE COPY ORIGINAL

January 14, 1999

Mr. Frank Jordan  
San Diego Community Radio  
9606 Tierra Grande - Suite 205  
San Diego, CA 92126

RECEIVED

JUL 19 1999

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Dear Mr. Jordan:

This letter is to confirm that FM broadcast receivers are now so selective that many more FM transmitters can be put into the 88 - 108 MHz band while protecting the coverage patterns of existing stations. The FCC should amend its short spacing table (FCC Rule Section 73.207) to allow FM transmitters in a given community to be spaced only 400 kHz apart, instead of 800 kHz which is the current requirement.

FM receiver technology has improved dramatically since the FCC's short spacing rules were invented. Solid state integrated circuits have allowed narrowband frequency synthesized receivers to replace 30 year old vacuum tube radios which drifted in frequency and suffered from "AFC capture" effects. It was the poor performance of the tube-type sets that led to the requirement that FM transmitters be spaced 800 kHz apart.

In summary, the FCC should revise its entire short spacing table to protect modern receivers of reasonable quality, not antiquated tube-type sets.

Sincerely,

Robert Gonsett  
President

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Sincerely,

Robert Gonsett  
President

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FCC MAIL ROOM

July 13, 1999

*Oklahoma City, OK*

Office of the Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

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Ref: MM Docket No. 99-25

I wish to voice our opposition to the Commission's establishment of a low power radio service.

In the last ten years or so, we saw a proliferation of stations across the country causing a financial strain on the industry. The Telcom Act somewhat remedied that in the larger markets. Will the creation of a low power service re-create the problem in medium and small markets? There are still many frequencies still available under the 80-90 rule. The low power service will not impact the larger markets, but can greatly increase the number of stations already in medium and small markets. Are they economically viable? How will it impact my station, which struggles in a small western Oklahoma community?

We already have a cluttered FM band and will potentially 4,000 new stations just add more clutter to the band?

We are looking forward to the implementation of IBOC digital radio in the near future. What about the potential interference problems that can be caused by this service?

Can the FCC take on the additional task of efficiently policing all of the stations created by this new service?

The low power FM radio service may sound great in theory, but we are greatly concerned with the potential problems it can cause.

Sincerely,

A handwritten signature in black ink, appearing to read "Donald Boyles".

Donald Boyles  
General Manager

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Phone (315) 782-1240  
Fax (315) 782-0312

## DOCKET FILE COPY ORIGINAL

July 14, 1999

Office of the Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, D.C. 20554

Re: MM Docket No. 99-25

Dear Secretary:

I am the President and owner of the following stations: WTOJ, Carthage, NY, WATN, Watertown, NY, WOTT, Henderson, NY, WWLF-FM, Copenhagen, NY, WBDR, Cape Vincent, NY and WCDO AM/FM, Sidney, NY.

I am opposed to the LPFM proposal for numerous reasons. First and foremost is the potential interference factor from such stations. Our FM station in Sidney, NY was the recipient of such interference when the FCC allowed translator W265AX on the air on the same frequency with 50 watts in Binghamton, NY forty miles from our tower site. The interference caused a degradation in our signal with numerous listener complaints. After much protesting, the FCC reversed their decision and forced the translator to re-locate. Will there be such remedies under the LPFM proposal? Such LPFMs will cause the same problems for existing stations.

Small markets will be affected the most severely...the mom and pop stations that still exist will have 1000 watt stations that will in essence cover the same limited population areas that we need to survive. Many of my stations are in communities with less than 5000 people in them. There's not enough room for additional competition in such arenas.

Following the Docket 80-90 increase in FM signals there was also a significant decrease in the news commitment and Public Affairs programming by radio stations. I believe that was the direct result of cuts in personnel and payrolls because of the increased competition. More competition doesn't always mean more diversity or more news, PA, etc.

The Communications Act of 34 requires broadcasters to act in the public's interest, convenience and necessity. That, at least in part, has been interpreted to mean the broadcaster should disseminate objective local news and public affairs. It is obvious to all that news and public service broadcasting requires a large direct labor component. Direct labor translates to available resources. If the resources in our typical small market are increasingly fragmented, the ability of all

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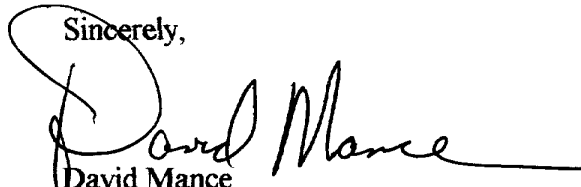
WTOJ-FM 103.1/WWLF-FM 106.7/WATN AM-1240/WOTT-FM 106.7/WBDR-FM 102.7

radio broadcasters to perform local news and public service would be compromised instead of expanded.

It also seems to me to be a probability that the new owners of LPFM operations would be largely single issue types...people who wish to promote their point of view exclusively. For example, limited view advocacy groups would be interested in having a channel. So would political organizations, religious sects, etc. It would seem that the fairness aspect of their LPFM operations would be very limited and not in the publics' best interest, convenience and necessity.

IN ESSENCE, the creation of LPFM will be **the creation of a "CB" band** on FM frequencies!!!

Sincerely,

  
David Mance  
President